

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.,

PLAINTIFF,

v.

BAKER & TAYLOR, LLC, *ET AL.*,

DEFENDANTS.

CASE No. 2:25-cv-309

JUDGE: EDMUND A. SARGUS

MAGISTRATE: ELIZABETH PRESTON DEAVERS

**DECLARATION OF STEVEN LEGOWSKI IN SUPPORT OF DEFENDANT
BRIDGEALL LIBRARIES LTD.'S MOTION TO DISMISS**

Steven Legowski declares the following pursuant to 28 U.S.C. § 1746:

1. My name is Steven Legowski and I am a resident of South Lanarkshire, Scotland.
2. I am over 18 years old, of sound mind, and competent to testify to the matters contained in this Declaration. I have personal knowledge of the facts stated in this Declaration.
3. I am the Vice President of Technology and Software Services of Bridgeall Libraries Ltd. ("*Bridgeall*"), a position I have held since July of 2024.
4. Prior to being the Vice President of Technology and Software Services, I held various positions with Bridgeall in its product development and technology departments for over ten (10) years.
5. I hold a Bachelor of Engineering from Glasgow Caledonian University and a Post Graduate Diploma in Information Technology from the University of the West of Scotland.
6. As Vice President of Technology and Software Services, I directly oversee the development and implementation of Bridgeall's various services, including its flagship library analytics software, collectionHQ.
7. I submit this declaration in support of Bridgeall's Motion to Dismiss OCLC, Inc.'s ("*OCLC*") complaint and motion for preliminary injunction against Bridgeall and Baker & Taylor, LLC ("*Baker & Taylor*"). I am familiar with the facts set forth herein based on my work history

and experience at Bridgeall, as well as my review of relevant Bridgeall records and publicly available information. On that basis, I believe the facts set forth herein to be true and correct.

Background on Bridgeall

8. Bridgeall is a private limited company specializing in business and domestic software development. It is incorporated under the laws of Scotland and has its principal place of business in Glasgow, Scotland.

9. Bridgeall is renowned for its flagship product, collectionHQ, a data-driven collection management solution designed to assist libraries in optimizing their collections through evidence-based methodologies.

10. Bridgeall currently has forty (40) employees, all based in the UK, with thirty-nine (39) based in Scotland, and one (1) based in Manchester, England. Around seventy-five percent (75%) of Bridgeall's employees are technical staff, but all employees service Bridgeall's various products in different ways.

11. Bridgeall does not own servers or other similar physical assets. To ensure that its products run smoothly around the world, Bridgeall uses AWS (Amazon Web Services) Cloud Based Infrastructure.

12. For customers based in the United States, Bridgeall uses the AWS Cloud Infrastructure in Northern Virginia.

13. Bridgeall does not contract with any vendors or third-party servicers in Ohio. Bridgeall employees run the products directly from Glasgow.

14. When customer libraries purchase a subscription for collectionHQ, they sign subscription agreements. The salesperson, who is a Baker & Taylor employee in the United States, will issue the new sale subscription agreement to the customer for the collectionHQ product.

Background on CollectionHQ

15. Founded in Glasgow in 2008, collectionHQ introduced the Evidence Based Stock Management (EBSM) methodology to the public library sector, enabling librarians to make informed decisions about their collections. The platform integrates with any Integrated Library System (ILS) and offers tools for selection, management, promotion, and evaluation of library materials.

16. collectionHQ provides libraries with valuable analytics, such as reports on which materials are being "checked-out", and which materials are collecting dust on the shelf.

17. collectionHQ also makes strategic recommendations and assists libraries with executing on collectionHQ's strategic recommendations.

18. Once the subscription is purchased, the customer library gains access to collectionHQ through their preferred web browser. The customer libraries do not have to download anything onto their systems.

19. A customer library is then able to initiate a transfer of its MARC data feed to collectionHQ. This transfer of data allows collectionHQ to determine the materials in that library's collection.

20. collectionHQ then uses the information provided by the library, as well as information from public sources, to analyze a library's circulation patterns and provide recommendations on how to manage the collection.

21. collectionHQ does not display or share the MARC data feed provided by a customer with any other customer.

22. To promote collectionHQ, the company utilizes general marketing campaigns through its website, LinkedIn, webinars, and email communications. These communications are not meant to target a community or location directly. They are general informational communications that are sent globally.

23. In fact, collectionHQ is generally available worldwide. There is no specific market or region that Bridgeall targets.

24. There are currently over five hundred (500) collectionHQ customers around the world. Of these five hundred plus (500+) customers, only nineteen (19) are library systems based in Ohio.

25. When customer libraries set up their subscription or require assistance later on, they engage customer success managers. These customer success managers are Baker & Taylor employees.

26. The Baker & Taylor customer success managers are based in Michigan, Pennsylvania, Florida, and California.

27. The subscription agreement includes an option for the customer library to gain access to BTCat, Baker & Taylor's bibliographic database. When libraries opt in, they license their MARC records to Baker & Taylor. When signing, the library represents that it has the authority to license these records.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 27, 2025.

Steven Legowski

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